

# Texas Alternative to Abortion Services Program

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*Prepared by:*



—T E X A S —  
PREGNANCY CARE  
—N E T W O R K —

November 2016



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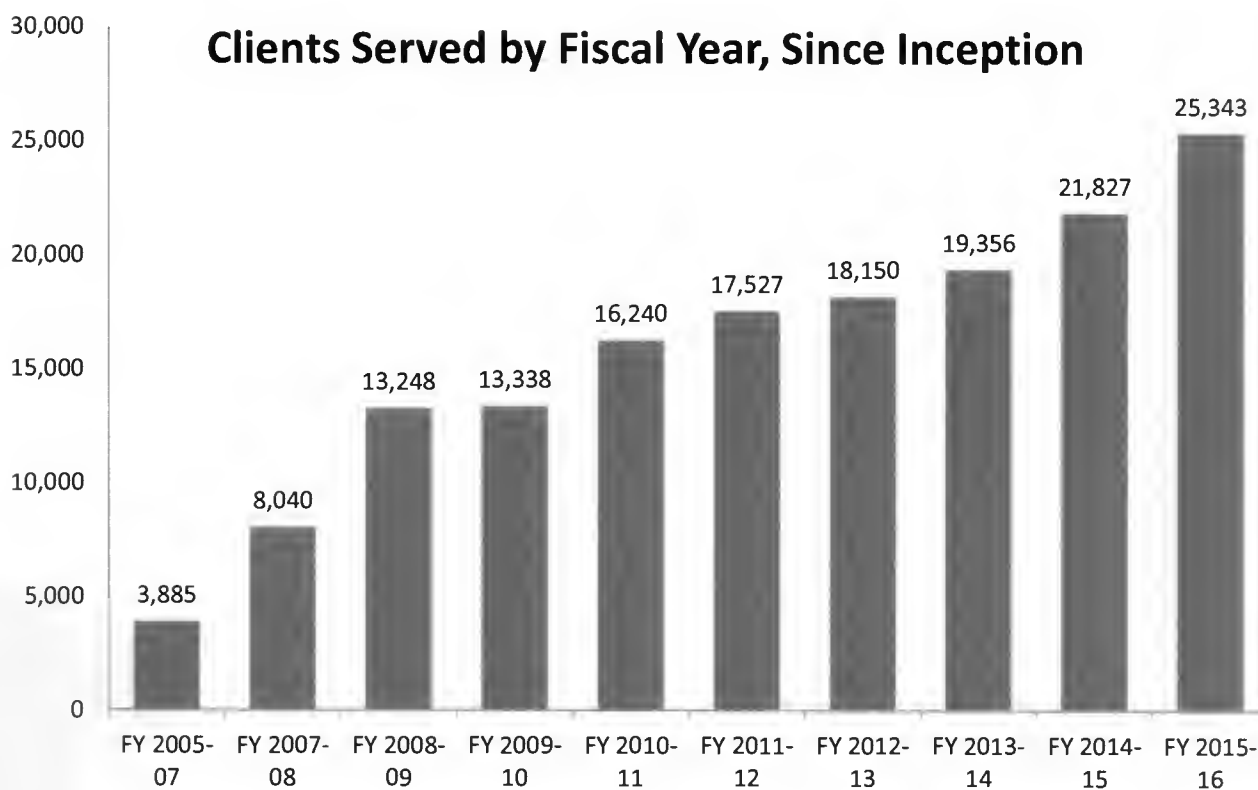
## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Performance: Clients Served**

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From Program inception through August 31, 2016:

- **Clients served:** **156,954<sup>1</sup>**
- **Client Complaints:** **0**



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<sup>1</sup> Sources: Quarterly Status Reports, Q4, FY 2005-2006, FY 2006-07, FY 2007-08, FY 2008-09, FY 2009-10, FY 2010-11, FY 2011-12, FY 2012-13, FY 2013-14, FY 2014-15, FY 2015-16 (combined YTD client totals); On file, Texas Health and Human Services Commission

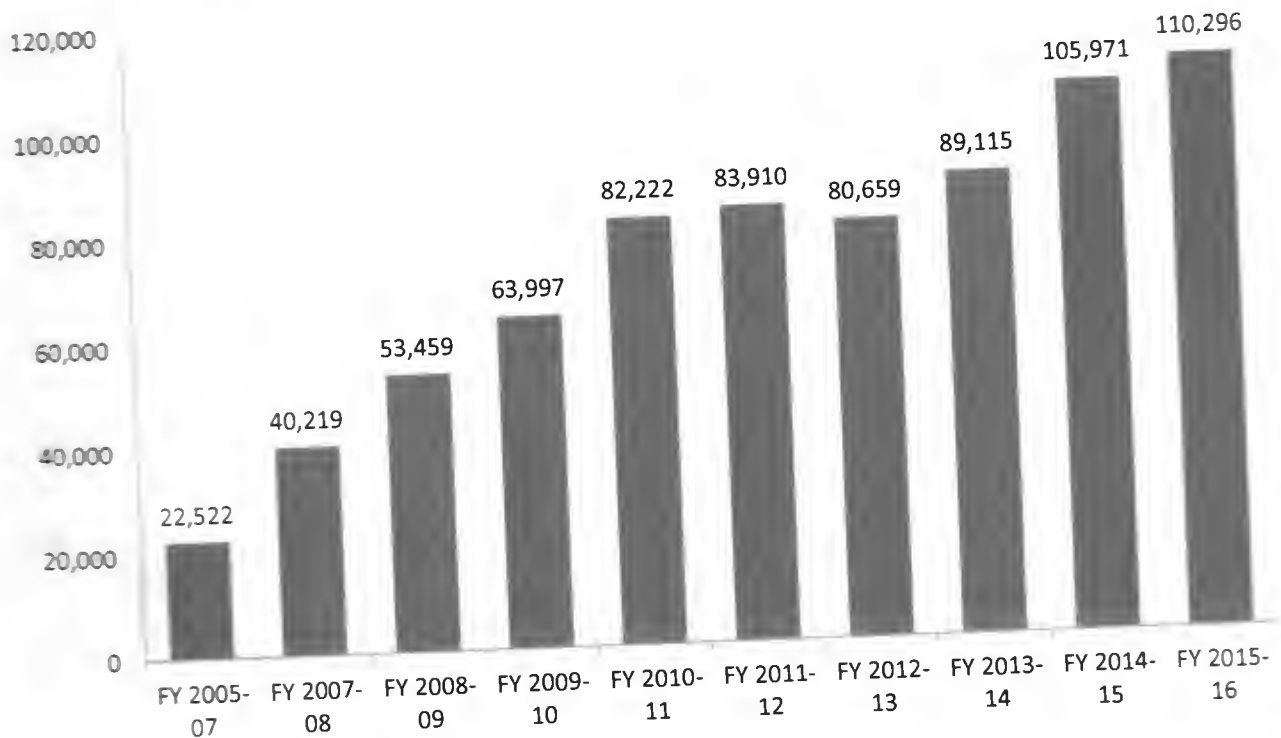
# MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** Program Performance: Client Visits

From Program inception through August 31, 2016:

- Client visits<sup>2</sup>: **732,370<sup>3</sup>**
- Client Complaints: **0**

## Client Visits by Fiscal Year, Since Inception



<sup>2</sup> Client visits identifies how many times an individual Program client returns for services.

<sup>3</sup> Sources: Quarterly Status Reports, Q4, FY 2005-06, FY 2006-07, FY 2007-08, FY 2008-09, FY 2009-10, FY 2010-11, FY 2011-12, FY 2012-13, FY 2013-14, FY 2014-15, FY 2015-16 (combined YTD client visit totals); On file, Texas Health and Human Services Commission



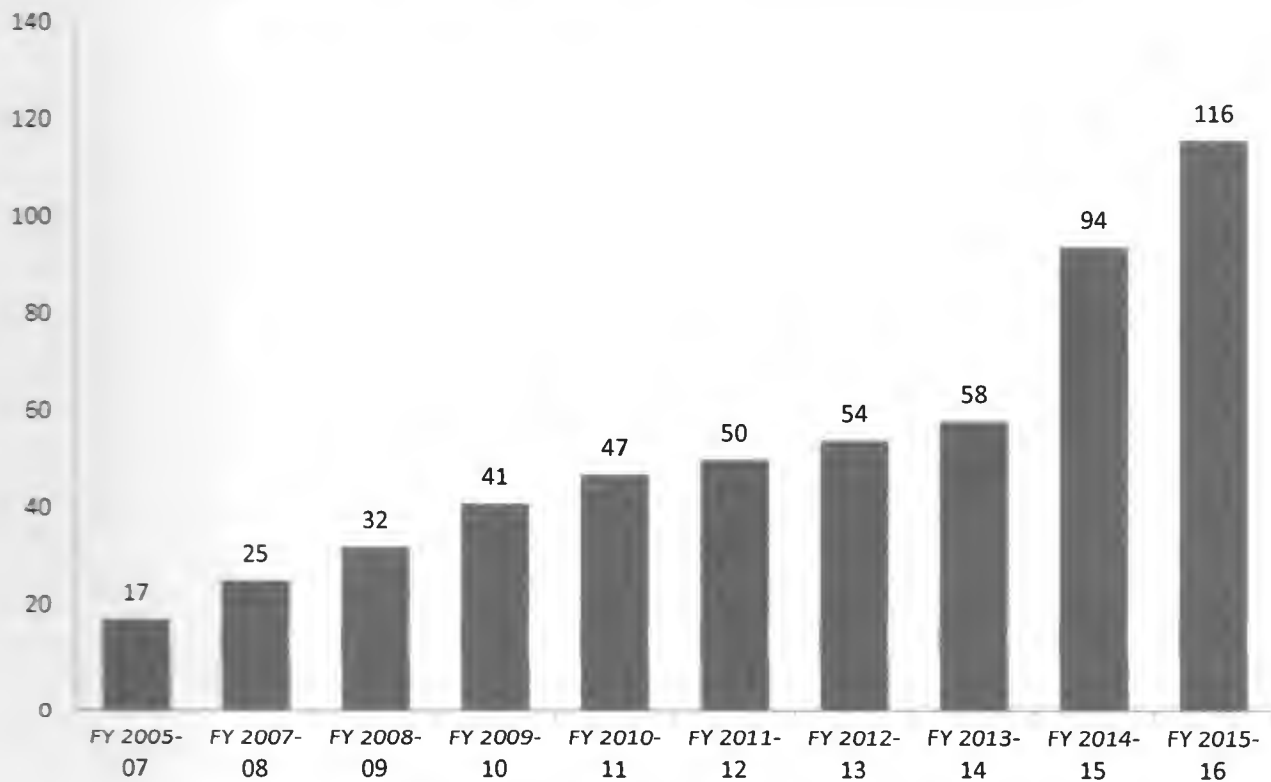
## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara  
**DATE:** November, 2016  
**RE:** **Program Performance: Program Locations Since Inception**

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At the end of FY 2015-16, the Program had 116 locations providing Client Services in Texas.

### Program Locations in Texas, Since Inception





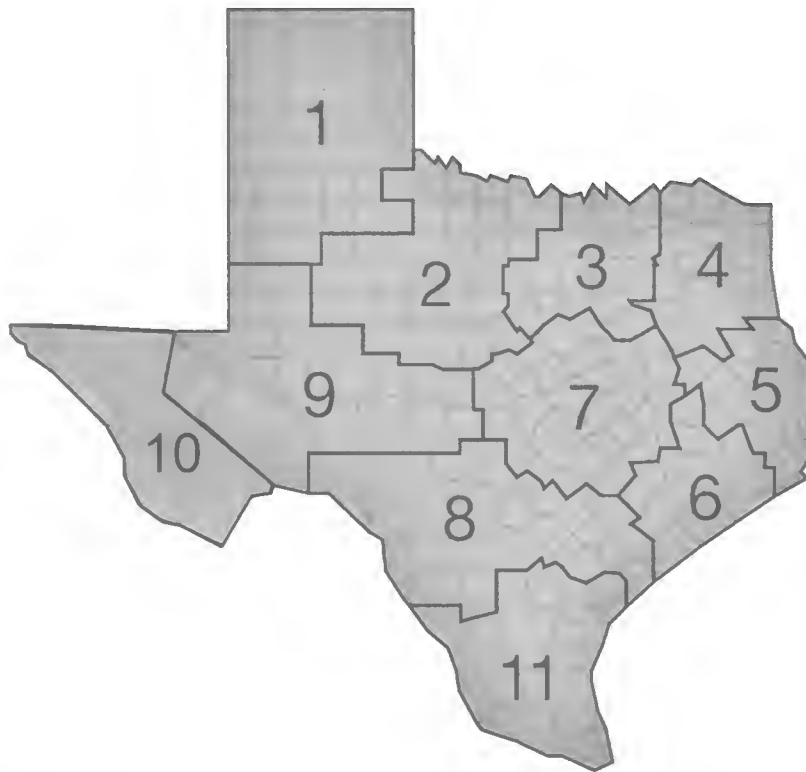
## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Performance: Program Locations in HHSC Regions**

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**Number of HHSC Regions with Provider contract, as of November 2016: 11 of 11**

Currently in: Regions 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 & 11



### PROVIDER LOCATIONS:

Provider Location Name	City	Zip	County	Region
Children's Connections Inc. - Amarillo	Amarillo	79109	Potter	1
Hope Cottage - Lubbock	Lubbock	79412	Lubbock	1
Children's Connections Inc. - Lubbock	Lubbock	79423	Lubbock	1
Pregnancy Resources of Abilene	Abilene	79603	Taylor	2
The Open Door Pregnancy Center - Breckenridge	Breckenridge	76424	Stephens	2
The Open Door Pregnancy Center - Cisco	Cisco	76437	Eastland	2



Provider Location Name	City	Zip	County	Region
Children's Connections Inc. - Abilene	Abilene	79606	Taylor	2
Children's Connections Inc. - Wichita Falls	Wichita Falls	76310	Wichita	2
Birth Choice	Dallas	75243	Dallas	3
Bridges Safehouse, Inc. - Main	Cedar Hill	75104	Dallas	3
Bridges Safehouse, Inc. - Thrifty Boutique	Cedar Hill	75104	Dallas	3
Catholic Charities of Dallas - Main	Dallas	75243	Dallas	3
Catholic Charities of Dallas - West Dallas Family Service Ctr.	Dallas	75212	Dallas	3
Children & Family Institute - Dallas	Dallas	75232	Dallas	3
Children & Family Institute - Ft. Worth	Fort Worth	76011	Tarrant	3
Children's Connections Inc. - Dallas	Dallas	75209	Dallas	3
Children's Connections Inc. - Ft. Worth	Fort Worth	76102	Tarrant	3
Children's Connections Inc. - Gainesville	Gainesville	76240	Cooke	3
ChristianWorks	Dallas	75230	Dallas	3
Family Care Connection - South Dallas	Dallas	75237	Dallas	3
Family Care Connection - Main Office	Dallas	75237	Dallas	3
Family Care Connection - West Dallas	Dallas	75212	Dallas	3
First Look	Waxahachie	75165	Ellis	3
Gladney Center for Adoption	Fort Worth	76132	Tarrant	3
Hope Cottage - Dallas	Dallas	75204	Dallas	3
Hope Mansion	Cedar Hill	75104	Dallas	3
Involved for Life - Downtown Pregnancy Center	Dallas	75201	Dallas	3
Involved for Life - Uptown Women's Center	Dallas	75204	Dallas	3
Loreto House	Denton	76201	Denton	3
Low Birth Weight Development Center	Dallas	75211	Dallas	3
Metroplex Mobile Pregnancy Clinic	Arlington	76010	Tarrant	3
Metroplex Women's Clinic - Mansfield	Mansfield	76063	Tarrant	3
Metroplex Women's Clinic - North	Arlington	76012	Tarrant	3
Metroplex Women's Clinic - Southeast	Arlington	76018	Tarrant	3
Metroplex Women's Clinic - Southwest	Arlington	76017	Tarrant	3
Raffa Clinic - Commerce	Greenville	75401	Hunt	3
Children's Connections Inc. - Texarkana	Texarkana	75503	Bowie	4
Children's Connections Inc. - Tyler	Tyler	75701	Smith	4
Expectant Heart Pregnancy Resource Center	Longview	75604	Gregg	4
Expectant Heart Pregnancy Resource Center II	Longview	75601	Gregg	4
First Choice Pregnancy Resource Center	Texarkana	75501	Bowie	4
Hope Cottage - Tyler	Tyler	75701	Smith	4
Living Alternatives of Jacksonville	Jacksonville	75766	Cherokee	4
Living Alternatives of Palestine	Palestine	75801	Anderson	4
Paris Pregnancy Care Center	Paris	75460	Lamar	4



Provider Location Name	City	Zip	County	Region
Paris Pregnancy Care Center of Red River County	Clarksville	75426	Red River	4
Raffa Clinic - Quinlan	Quinlan	75474	Hunt	4
Children's Connections Inc. - Beaumont	Beaumont	77707	Jefferson	5
Children's Connections Inc. - Lufkin	Lufkin	75904	Angelina	5
Living Alternatives of Palestine - Crockett	Crockett	75835	Houston	5
Pregnancy Help Center of Lufkin	Lufkin	75904	Angelina	5
Anchor Point - League City	League City	77573	Galveston	6
Anchor Point - Seabrook	Seabrook	77586	Harris	6
Catholic Charities of the Archdiocese of Galveston-Houston - Central Office	Houston	77006	Harris	6
Catholic Charities of the Archdiocese of Galveston-Houston - Fort Bend County	Stafford	77477	Ft. Bend	6
Catholic Charities of the Archdiocese of Galveston-Houston - Mamie George Community Center	Richmond	77469	Harris	6
Catholic Charities of the Archdiocese of Galveston-Houston - Moran Health Center	Houston	77002	Harris	6
Children's Connections Inc. - Houston	Houston	77098	Harris	6
Houston Pregnancy Help Center - Downtown	Houston	77004	Harris	6
Houston Pregnancy Help Center - Fifth Ward	Houston	77020	Harris	6
Houston Pregnancy Help Center - Mobile Medical Van	Houston	77004	Harris	6
The Source for Women - Galleria	Houston	77057	Harris	6
The Source for Women - Northeast	Houston	77093	Harris	6
The Source for Women - Spring Branch	Houston	77055	Harris	6
Waller Pregnancy Care Center	Waller	77484	Waller	6
Annunciation Maternity Home	Georgetown	78628	Williamson	7
Austin LifeCare	Austin	78757	Travis	7
Care Net of Central Texas Medical Services	Waco	76710	McLennan	7
Care Net Pregnancy Support Center and Guesthouse	Waco	76701	McLennan	7
Catholic Charities of Central Texas - Counseling Services	Austin	78754	Travis	7
Central Texas LifeCare – Main	San Marcos	78666	Hays	7
Central Texas LifeCare – Ranch	San Marcos	78666	Caldwell	7
Children's Connections Inc. - Austin	Austin	78757	Travis	7
Children's Connections Inc. - Bryan	Bryan	77802	Brazos	7
Children's Connections Inc. - Killeen	Killeen	76542	Bell	7
Children's Connections Inc. - San Marcos	San Marcos	78666	Hays	7
Children's Connections Inc. - Waco	Waco	76710	McLennan	7
Gabriel Project Life Center - Austin	Austin	78754	Travis	7
Gabriel Project Life Center - Brazos Valley	Bryan	77801	Brazos	7
Our Lady of the Angels Maternity Shelter	Temple	76504	Bell	7
Pregnancy Help Center of Williamson County	Georgetown	78626	Williamson	7
St. John Paul II Life Center	Austin	78731	Travis	7





Provider Location Name	City	Zip	County	Region
American Indians in Texas – San Antonio Fatherhood Campaign	San Antonio	78228	Bexar	8
American Indians in Texas – Healing a Wounded Spirit	San Antonio	78207	Bexar	8
A Woman's Haven	San Antonio	78240	Bexar	8
Catholic Counseling & Consultation Center	San Antonio	78205	Bexar	8
Children's Connections Inc. - Eagle Pass	Eagle Pass	78852	Maverick	8
Children's Connections Inc. - San Antonio	San Antonio	78212	Bexar	8
Children's Connections Inc. - Victoria	Victoria	77904	Victoria	8
Guadalupe Home	San Antonio	78207	Bexar	8
Life Choices Medical Clinic	San Antonio	78238	Bexar	8
Providence Place	San Antonio	78240	Bexar	8
SAMMinistries - Blanco	San Antonio	78216	Bexar	8
SAMMinistries - Haven	San Antonio	78207	Bexar	8
SAMMinistries - Piedras	San Antonio	78228	Bexar	8
San Antonio Birth Doulas	San Antonio	78207	Bexar	8
Seton Home	San Antonio	78210	Bexar	8
St Jude's Ranch for Children - Bulverde	Bulverde	78163	Comal	8
St Jude's Ranch for Children - New Braunfels	New Braunfels	78132	Comal	8
St Jude's Ranch for Children - San Antonio	San Antonio	78217	Bexar	8
Children's Connections Inc. - Midland	Midland	79705	Midland	9
Children's Connections Inc. - San Angelo	San Angelo	76904	Tom Green	9
The Life Center - Andrews	Andrews	79714	Andrews	9
The Life Center - Big Spring	Big Spring	79720	Howard	9
The Life Center - Midland	Midland	79701	Midland	9
The Life Center - Odessa	Odessa	79761	Ector	9
Children's Connections Inc. - El Paso	El Paso	79901	El Paso	10
Hope Cottage - El Paso	El Paso	79902	El Paso	10
Catholic Charities of the Rio Grande Valley - Brownsville Office	Brownsville	78520	Cameron	11
Catholic Charities of the Rio Grande Valley - San Juan Office	San Juan	78589	Hidalgo	11
Children's Connections Inc. - Corpus Christi	Corpus Christi	78415	Nueces	11
Children's Connections Inc. - Edinburg	Edinburg	78539	Hidalgo	11
Children's Connections Inc. - Laredo	Laredo	78045	Webb	11
Corpus Christi Hope House	Corpus Christi	78404	Nueces	11



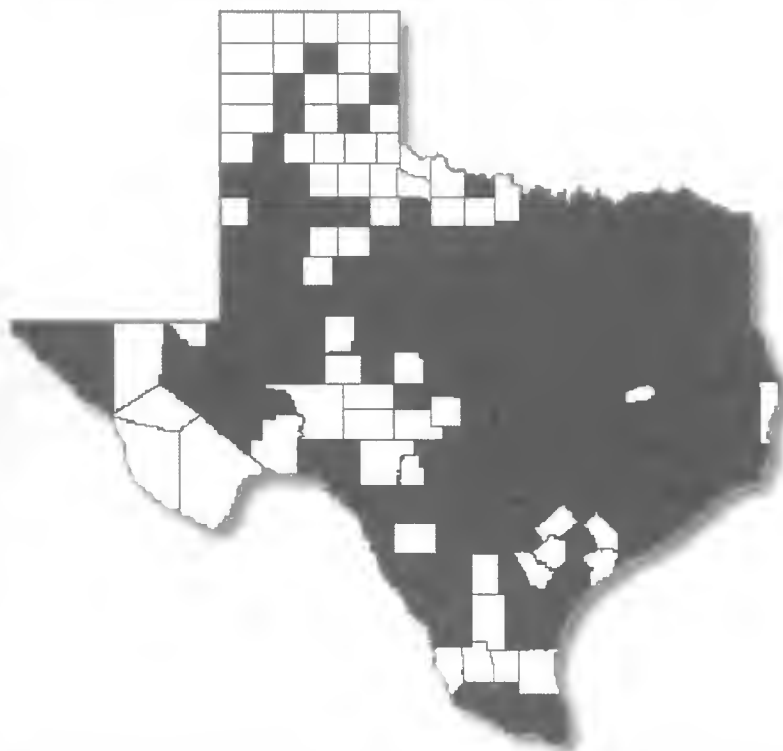
## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Performance: Client Origin, By County**

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From Program inception through August 31, 2015:

- Client Counties of Origin: **189<sup>4</sup>**  
Counties of Residence of Clients Served Since Program Inception



- Residents of the 189 counties served by the Program accounted for 99.4% of all abortions in the state according to 2013 data available from DSHS.<sup>5</sup>
- The highest percentage of Program clients are ages 20-24, which corresponds to the highest percentage of women by age seeking abortions in Texas.<sup>6</sup>

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<sup>4</sup> Sources: Quarterly Status Reports, Q4, FY 2005-06, FY 2006-07, FY 2007-08, FY 2008-09, FY 2009-10, FY 2010-11, FY 2011-12, FY 2011-12, FY 2012-13, FY 2013-14, FY 2014-15, FY 2015-16 (YTD Clients by Age) (combined totals)

<sup>5</sup> Texas Department of State Health Services, Vital Statistics 2013 Annual Report, Table 34, "Induced Terminations of Pregnancy by Age and County of Residence."

<sup>6</sup> Texas Department of State Health Services, Vital Statistics 2013 Annual Report, Table 34, "Induced Terminations of Pregnancy by Age and County of Residence."



## MEMO

**TO:** Program Inquiry: Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Performance: Contractor Standards for Excellence**

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- In 2009, Texas Pregnancy Care Network earned the Seal of Excellence®, in recognition for meeting the highest standards of ethics and accountability in its nonprofit governance, management, and operations.
- TPCN is the first nonprofit organization in Texas to earn the Seal of Excellence® distinction.
- A national peer review team of nonprofit experts evaluated TPCN for compliance with 55 standards comprising the *Standards for Excellence: An Ethics and Accountability Code for the Nonprofit Sector*, designed by the Standards for Excellence Institute®.
- Based in Maryland, the Standards for Excellence Institute is a national initiative that promotes the highest standards of ethics and accountability in nonprofit governance, management, operations, and facilities.
- Every five years, the Standards for Excellence Institute undertakes another in-depth examination of organizations that hold the Seal of Excellence®. In 2014, TPCN was re-certified with the Seal of Excellence® by the Standards for Excellence Institute.



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Performance: Metrics**

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The Quarterly Status Report is the primary vehicle for reporting Program metrics.

The Quarterly Status Report identifies hundreds of actual outcomes and metrics including but not limited to the following:

- Visitors to [www.texaspregnancy.org](http://www.texaspregnancy.org); Professionals educated about Program through Community Outreach strategy; Number of Provider sites participating; Number of clients served; Number of client visits; Number of clients who attended Parenting Class; Number of Clients counseled on Parenting Skills; Number of clients who received Adoption Education

The Quarterly Status Report provides data regarding:

- Incidence of counseling, mentoring, and referrals related to:
  - Abortion Education; Abuse; Adoption Education; Anger Management; Baby proofing Home; Breastfeeding; Breast Pumping; Budgeting for Family; Car seat Training; Child Support; Child Vaccinations; Childbirth; Cord Blood Banking; C-Section Primer; Daycare; Decision Making; Education; Financial; Guardianship; Housing; Infant CPR; Initial Intake; Legal; Life Skills; Maternal Well-Being; Maternity Leave; Medical; Newborn Care; Newborn Wrapping; Other ; Postpartum Depression; Parenting; Prenatal Care; Prenatal Development; Prenatal Exercise; Prenatal Nutrition; Relationship; Sleep Strategy; Smoking Cessation; Stress Management; STD Information/Risks; Ultrasound Education
- Incidence of Education Classes related to: Certified Childbirth Instruction; Family Support; Newborn Care; and Pre-Natal Care
- Incidence of Materials Assistance related to: Baby Accessories; Baby Clothing; Baby Furniture; Diapers; Food; Maternity Clothing; and Toiletries

The Quarterly Status Report identifies the amount of services billed for:

- Counseling/Mentoring; Education Classes for Clients; Education Classes for Client's Family; Family Counseling/Mentoring; Materials Assistance: On-Site; Phone Counseling/Mentoring; Referrals

The Quarterly Status Report identifies data associated with outreach efforts, including:

- Unique visits to [www.texaspregnancy.org](http://www.texaspregnancy.org) outreach website



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Performance: Outreach Strategy**

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The outreach advertising strategy for the Alternatives Program remains primarily focused on online advertisements.

- Online ads placed refer potential clients to [texaspregnancy.org](http://texaspregnancy.org) outreach website
- Visitors are directed to a zip code-based locator so they can find the Provider closest to them
- Additionally, many other types of advertising mediums have been used for public awareness campaigns including billboards, radio, television, and print.



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Performance: FY 2015-16 4<sup>th</sup> Quarter Contractual Performance Measures**

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TPCN and HHSC entered into a new contract that began in the 4<sup>th</sup> Quarter of Fiscal Year 2015-16. The following is a summary of TPCN's performance against its stated contract goals for the 4<sup>th</sup> Quarter of Fiscal Year 2015-16:

TPCN's 4 <sup>th</sup> Quarter Contractual Goal:	TPCN Exceeded Goal by:
TPCN will educate at least 750 school nurses, school counselors, and other professionals who are able to refer potential clients to its services.	TPCN Exceeded Goal by 6%
TPCN will be providing services in at least 105 locations.	TPCN Exceeded Goal by 10%
TPCN will serve at least 5,050 clients in the state.	TPCN Exceeded Goal by 75%
TPCN clients will make at least 24,000 visits to Provider locations.	TPCN Exceeded Goal by 31%
At least 900 clients will attend parenting classes.	TPCN Exceeded Goal by 79%
At least 2,000 clients will be counseled on parenting skills.	TPCN Exceeded Goal by 165%
At least 900 clients will be counseled on adoption.	TPCN Exceeded Goal by 127%



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara  
**DATE:** November, 2016  
**RE:** **Program Expenditures: FY 2015-16 Costs**

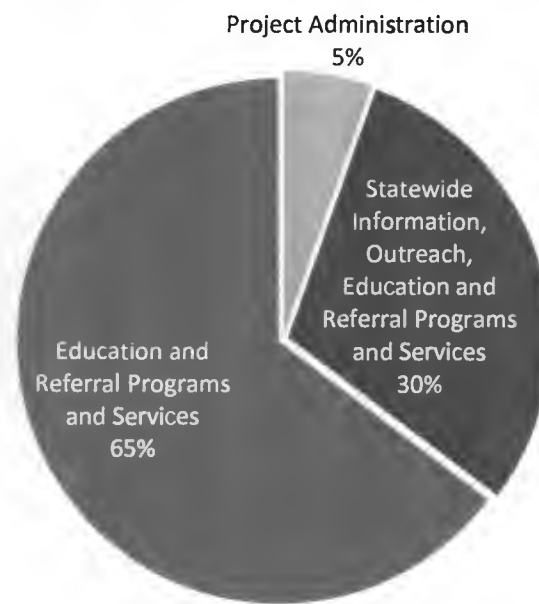
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Final costs for FY 2015-16<sup>7</sup>:

- Project Administration: \$498,588.07
- Statewide Information, Outreach, Education and Referral Programs and Services: \$2,726,655.27
- Client Services: \$5,924,756.66

**Administrative costs only comprised 5% of the entire Program fiscal budget.**

### Final costs for FY 2015-16



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<sup>7</sup> Source: Monthly Financial Report, August 2016; On file, Texas Health and Human Services Commission



## MEMO

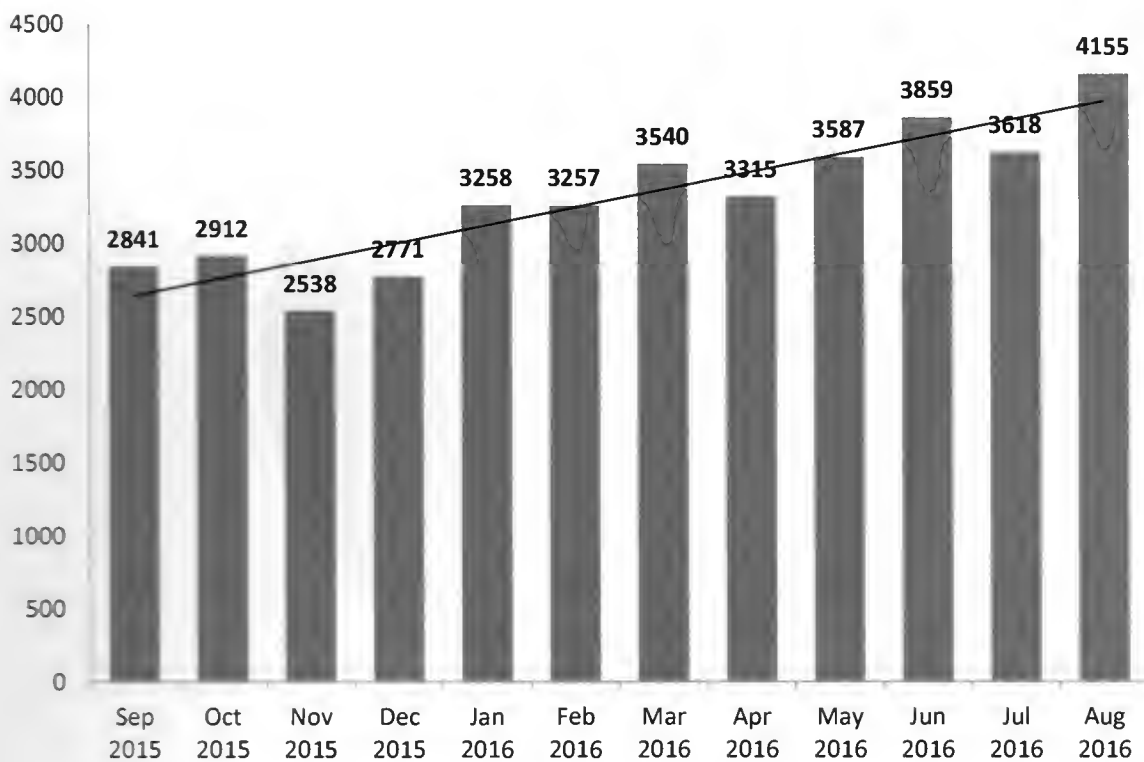
**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara  
**DATE:** November, 2016  
**RE:** **Program Expansion: Clients Served During FY 2015-16**

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Fiscal Year 2015-16 had tremendous growth for the Program from beginning to end:

- Number of Clients Served in September 2015: **2,841**
- Number of Clients Served in August 2016: **4,155 (46% increase from Sep 2015)**

### Monthly Growth in Clients Served Fiscal Year 2015-16







## MEMO

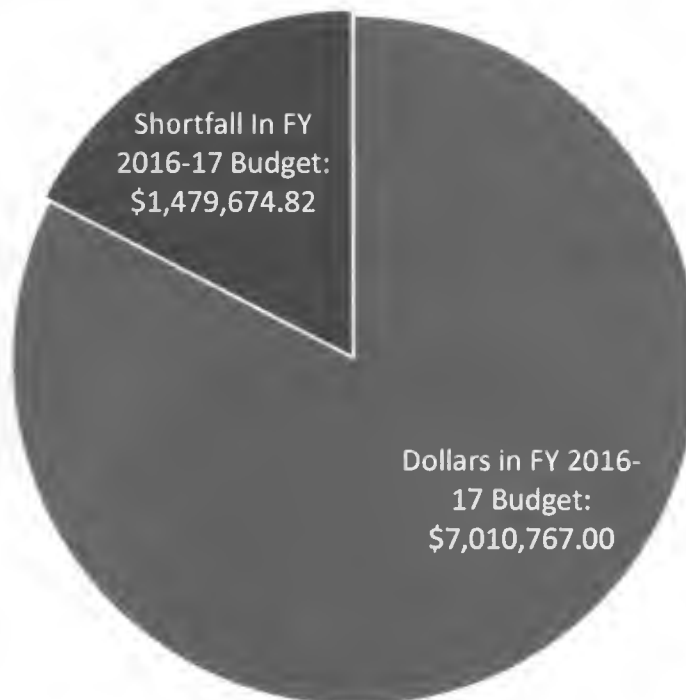
**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara  
**DATE:** November, 2016  
**RE:** **Program Expansion: FY 2016-17 Client Services Shortfall**

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Projected Program Expenditures: 2016-17 Client Services

- FY 2016-17 Reimbursements Earned Through October 2016 = \$ 1,257,627.35 <sup>8</sup>
- Projected Services To Be Invoiced For Remainder of FY 2016-17 = \$ 7,234,042.67 <sup>9</sup>
- **FY 2016-17 Client Services Reimbursement Shortfall = \$ 1,479,674.82**

### FY 2016-17 Projected Provider Shortfall



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<sup>8</sup> October 2016 Monthly Financial Report to HHSC

<sup>9</sup> This is an estimate based on annualizing the amount of reimbursements through October 2016 (FY 2016-17) based on historical reimbursement levels from FY2014-15. This is purely an estimate and is subject to change. The actual amount of Program reimbursement for FY 2016-17 will be reported to HHSC in the Quarterly Report covering the 4<sup>th</sup> Quarter of FY 2016-17.



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Providers: Pregnancy Support Center Participation**

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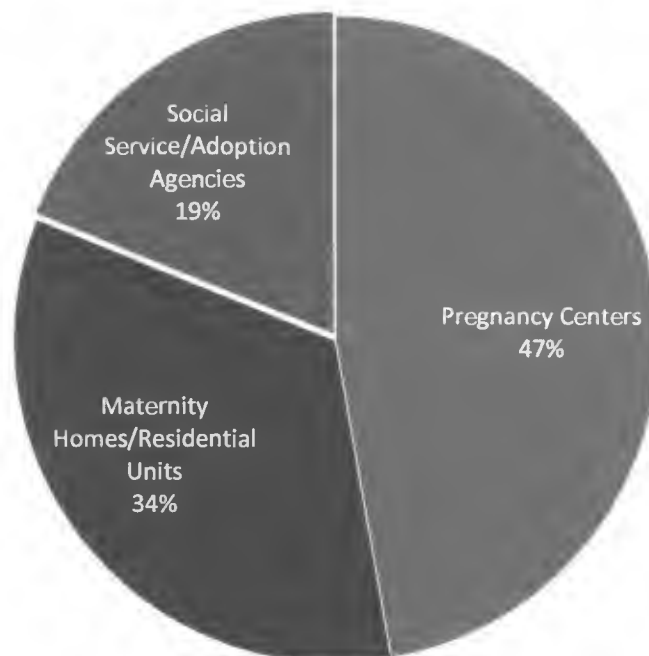
Critics characterize the Program as funding only for "crisis pregnancy centers."

- Historically, pregnancy support centers are recipients of less than 48% of reimbursements. Social service agencies, adoption agencies, and maternity homes combine as the largest funding recipients.

Some national reports have accused crisis pregnancy centers of practices that deceive or scare clients. Organizations of this kind are not participating in the Program:

- TPCN ensures it only contracts with organizations that provide compassionate and caring client services.
- TPCN reviews potential providers' phone procedures and advertisements thoroughly as part of its evaluation to make sure clients know the scope of services.
- TPCN does not approve of the use of graphic images or descriptions of abortions, regardless of whether a client consents.

### FY 2015-16 Services Invoiced - Type of Provider





## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Providers: Types of Organizations**

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- Participating Providers are diverse
- All offer the core service of decision-making support in favor of childbirth rather than abortion
- All are IRS 501(c)3 organizations
- All Providers serve their clients free of charge
- Among the Program's Providers are:
  - Licensed residential care facilities;
  - Social service agencies that provide long-term case management by licensed social workers;
  - Pregnancy support centers that offer crisis mentoring, education classes, and materials support both during and after pregnancy;
  - A birth doula organization that specializes in education and support during childbirth; and
  - Licensed adoption agencies that help clients decide between parenting and adoption.
- Several of the Providers offer more than just one service; for example, one provider is licensed as both a residential care facility and an adoption agency.



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Providers: Support Provided to Clients**

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The Program's Providers:

- Educate. Many women want to continue their pregnancy, but feel internal pressure to abort. Providers educate women about how continuing with a pregnancy—and life beyond pregnancy—is possible.
- Protect. A “woman’s right to choose” is often exercised not by women, but by coercive boyfriends, husbands, or parents. Providers represent a refuge from external pressure placed on women by others during a difficult pregnancy.
- Comfort. Like anyone in crisis, women in crisis pregnancy primarily need someone to talk to. Providers help relieve the despair that can lead to panicked decision-making.
- Provide. The Program provides mentoring, education classes, materials assistance, referrals to community and medical resources, and adoption education.
- Connect. Through referrals, Providers connect clients with community and medical resources to help them throughout their pregnancy and after their child is born.



# MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Providers: Selection Process**

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Standards are high. The following is a non-exhaustive list of documents and items examined as part of the Provider application:

- Incorporation Documents
- IRS 501(c)(3) Notice
- Names and Addresses of Board of Directors
- Bylaws
- Mission Statement
- Insurance Coverage
- Form 990
- Licenses
- Good Standing with State
- Org Chart
- Diplomas, Licenses and Certifications
- Training and Orientation Materials
- Nondiscrimination Policy
- Full Menu of Services
- Website and Social Media
- Advertising
- Proof of Free Services
- Proof that Services Offered for at least 1 year
- Education Materials
- Policies and Procedure Manual
- Policies on Abortion and Abortifacient Contraception
- Client Nondiscrimination Policy
- Client Confidentiality Policy
- Release of Information Policy
- Client Grievance Policy
- English Limitation Policy
- Facilities Floor Plan
- List of Referral Sources



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Providers: Quality Control & Monitoring**

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After Provider Selection Process (see Memo Re: Selection Process), TPCN inspects the physical locations during a Facilities Tour. Approved locations must (list not exhaustive):

- be handicapped accessible or have the capability to make special provisions for persons with disabilities
- be clean, comfortable, facilitate confidential services, and meet fire safety measures
- demonstrate evidence that key employee and client policies are accessible, living documents within the organization

After the Facilities Tour, Provider staff (list not exhaustive):

- are trained in Program compliance
- are re-trained annually (mandatory) at end of each fiscal year
- must undergo child abuse, criminal background, and sexual predator checks; must be renewed annually
- must certify they have a four-year degree in a social service or nursing field of study, or otherwise have received comprehensive pregnancy counseling/mentoring skills orientation and training
- must agree to follow policies on non-discrimination, confidentiality, and limited English proficiency

Ongoing monitoring begins once new Provider begins services, and occurs in various forms daily, monthly, and annually (list not exhaustive):

- **Daily:** The online billing system enforces the billing requirements so that each invoice entered must comply with Program reimbursement rules. TPCN manually inspects invoices, scrutinizing invoices for errors or non-compliance. A full-time staff person is dedicated to managing this task.
- **Monthly:** TPCN reviews Provider performance to detect areas that may need further Program training. Review is conducted by another full-time staff person; yet another full-time position is dedicated to ongoing Program training.
- **Annually:** Every Provider receives in-person Annual Monitoring. Physical facilities are again inspected; management is interviewed to alert changes to corporate and organizational policies; and client files are matched with reimbursed invoices to confirm services can be substantiated.
- As a result of any non-compliance with services already reimbursed by the Program, TPCN deducts the value of those services from the Provider's next-month reimbursement.



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Purpose: Why Abortion Alternatives?**

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- The purpose of the Texas Alternative to Abortion Services Program is to enhance and increase resources available to women facing unplanned pregnancies that promote childbirth rather than abortion.
- Abortion Alternatives are:
  - Necessary. The Program does not create needs; it responds to them. Thousands of women seek alternatives to abortion every day. Public funding helps ensure continuity and availability of quality services throughout Texas.
  - Progressive. Abortion alternatives represent a refreshing and rare middle ground when it comes to abortion-related issues. Allegiance to abortion rights or restrictions is irrelevant; the only allegiance required is to helping pregnant women.
  - Smart. Eliminating the crisis in an unplanned pregnancy is a more intelligent response than eliminating the pregnancy itself. Program Providers help eliminate the crises, and help women understand how continuing with their pregnancy is possible.
  - Decent. A society that is decent should provide pregnant women who are alone, scared, and under pressure more than just the choice of abortion as a response to an unplanned pregnancy.



## MEMO

**TO:** Texas Alternative to Abortion Services Program  
**FROM:** John McNamara, Esq.  
**DATE:** November, 2016  
**RE:** **Program Purpose: Social Services**

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- The Program is a social services program. It is not intended to be medical.<sup>10</sup>
- The Texas Alternative to Abortion Services Program is no different than other social services programs, like Family Violence. The core services are counseling, mentoring, education, materials assistance, shelter, and referrals.
- Pregnant women seek more than the medical community can provide.
- The medical community does not provide counseling, mentoring, education, materials assistance, and shelter to pregnant women. They refer to social service agencies to provide these services.

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<sup>10</sup> Some Providers do provide limited medical services; however, these are not a part of the Program and are not reimbursed by the Program.